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November 13, 2020

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Grant, et al. v. Trump, et al.; Case No. 20-cv-07103-JGK

Dear Judge Koeltl:

We are counsel for plaintiffs Edmond Grant p/k/a “Eddy Grant”, Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company (collectively, “Plaintiffs”) in the above-referenced action commenced against defendants President Donald J. Trump and Donald J. Trump For President, Inc. (collectively “Defendants”).

On November 11, 2020, Defendants filed a motion to dismiss Plaintiffs’ complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure [Doc. 18]. However, Defendants failed to request a pre-motion conference with respect to such motion, as required by Section II.B. of Your Honor’s Individual Practices. Defendants, by failing to comply with Your Honor’s rules, deprived Plaintiffs of the opportunity to demonstrate the futility and lack of merit of Defendants’ proposed motion.

In light of the foregoing, we respectfully request the Court’s guidance as to whether the Court will require a conference concerning Defendants’ motion to dismiss or whether Plaintiffs should oppose the motion within the time period proscribed by Local Civil Rule 6.1(b).

Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Brian D. Caplan

Brian D. Caplan

cc: All attorneys of record (via ECF)